

**Air Pollution Control District
Jefferson County, Ky
7 May 2000**

TITLE V PERMIT SUMMARY

Company: Outer Loop Recycling and Disposal Facility/WMK-Louisville Hauling,

Plant Location: 2673 Outer Loop/ 7501 Grade Lane, Louisville, KY 40219

Date App. Received: 22 April 1997

Date Admin. Complete: 11 June 1997

Date of Draft Permit: 7 May 2000

Date of Proposed Permit: 8 June 2000

District Engineer: Jeani Shashkova

Permit No.: 149-97-TV

Plant ID: 0532

SIC Code(s): 4953

NAICS: 562212

AFS: 00532

Introduction:

This permit is to be issued according to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide practical methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and lead (Pb); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone (O₃).

Application Type/Permit Activity:

- ☒ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☐ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Compliance schedule included
- ☐ Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** Landfill gas is produced as a result of the waste decomposing.
3. **Overall Process Description:** The process includes a solid waste disposal facility having the meaning defined in 40 CFR 60.751 pertaining to all contiguous land and structures, other appurtenances (including haul roads, future cells within the units defined in Landfill Gas Collection and Control System Design Plan and the management of leachate) and the improvements on the land used for the disposal of solid waste in addition to other waste management practices such as solidification, bioremediation and the insignificant activity of composing.

The source receives municipal solid waste which is then disposed of in a landfill. Landfill gas is produced as a result of waste decomposition. Leachate from the landfill is collected and processed in the sequential batch reactor pre-treatment facility. Contaminated material is stockpiled and aerated in a closed loop setup to allow microorganisms to degrade the organic contamination. Liquid waste goes through a solidification process.

Also the WMK-Louisville Hauling Division has affected facilities that include: trash containers are sandblasted with abrasive and painted in spray paint booth, storage tanks and other miscellaneous insignificant activities.

4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
 - a. **U-1:** Landfill / Outer Loop
 - b. **U-2:** Leachate / Outer Loop
 - c. **U-3:** Bioremediation / Outer Loop
 - d. **U-4, U-8:** Gasoline storage tanks / Outer Loop and Louisville Hauling
 - e. **U-5:** Solidification / Outer Loop
 - f. **U-6:** Truck traffic - exempt from permit requirements
 - g. **U-7:** Paint booth / Louisville Hauling

h. **U-9:** Sandblasting / Louisville Hauling

6. Fugitive Sources:

a. Compost process

b. Truck traffic

7. Title V Major Source Status by Pollutant:

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status Potential to Emit
CO	11.87	NO
NO _x	25.97	NO
SO ₂	20.63	NO
PM ₁₀	6.09	NO
Non HAPVOC	76.85	YES
Single HAP >1 tpy		
Acrylonitrile	1.13	YES
Ethyl Benzene	1.67	YES
Hexane	1.90	YES
Methyl ethyl ketone	2.6	YES
Methylene chloride	4.068	YES
Tetrachloroethylene	2.07	YES
Toluene	12.19	YES
Trichloroethane	1.24	YES
Vinyl chloride	1.54	YES
Xylenes	4.36	YES
Total HAPs	37.59	YES

8. NSPS Standards: The company submitted the required Landfill Gas Collection and Control System Design Plan, required by 40 CFR 60, Subpart WWW, which was reviewed and adopted on 15 December, 1997.

9. Applicable Requirements:

<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> Other
<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NESHAPS	<input checked="" type="checkbox"/> District-Origin	<input type="checkbox"/> MACT

10. Referenced Federal Regulations in Permit: 40 CFR 60, Subpart WWW

II. Regulatory Analysis

- 1. Emission and Operating Caps:** The source is not subject to any plant-wide emission or operating caps.
- 2. Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
- 3. Operational Flexibility:** The source did not request to operate under alternative operating scenarios in its Title V Permit Application.
- 4. Testing Requirements:** See the Emission Unit section of the Title V permit for all testing requirements.
- 5. Monitoring, Record Keeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate ongoing compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

For periodic monitoring, the source shall:

Opacity

- a. **Emission Units U1, U5, U7, U9** - The weekly visible emissions surveys for: the liquid solidification process; the spray paint booth; and the sandblasting operation is adequate periodic monitoring to demonstrate ongoing compliance with the opacity standards. The source is required to initiate corrective action within 8 hours if visible emissions are observed during a survey. If visible emissions persist, within 24 hours, the owner or operator is required to perform a Method 9 test. These emission units have no history of failure to comply with the opacity standards.
- b. **Emission Units U2, U3, U4, U8** - No visible emission surveys are necessary because the District has determined that it is unlikely that these units will ever create a visible plume based on information provided by the company.

The open flares 1 & 2 have been determined not to require opacity monitoring, by the District. By their configuration, they are open to the ambient air and thus have plenty of combustion air. They are used to combust

methane, a clean burning fuel. It is unlikely for opacity to be of a concern with these units. 40 CFR 60, Subpart WWW does not require such monitoring and because this regulation is a post 1990 regulation, it is supposed to have adequate monitoring included.

VOC

Emission Units U1, U2, U3, U4, U8, U7 - The periodic monitoring for the paint booth consists of recording: coating name; solvents used; daily paint usages; VOC content; and the calculated daily, monthly, and annual VOC emissions. The District has determined that the daily record keeping is sufficient monitoring to demonstrate ongoing compliance with the VOC limits. A one time demonstration with engineering calculations was sufficient for the leachate treatment; the bioremediation of contaminated soil; and the liquid solidification process to show compliance with the standards as submitted.

6. Off-Permit Documents

The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventative Maintenance Program (PMP), Management Of Change System (MOCS); or other documents which are too voluminous to place in the permit. The following document is considered by the District to be an off permit document:

“Landfill Gas Collection and Control Plan”, dated 5/30/97, rev. 12/15/97

The Title V permit summary is not considered an off-permit document, thus it is not a regulatory document.

III. Other Requirements

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not request any short term activities.
3. **Compliance Schedule/Progress Reports:** The source is in compliance with all applicable requirements; therefore, no schedule of compliance or progress reports are necessary other than as indicated in its Landfill Gas Collection and Control System Design Plan.
4. **Emissions Trading:** None

5. **Acid Rain Requirements:** This source is not subject to the Acid Rain Program.
6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not use any of the listed chemicals.
7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
8. **Insignificant Activities:** The following activities, as referenced in the company's Title V permit application, have been determined by the District to be insignificant.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Internal combustion engines fixed or transportable	7	Reg 2.02, sec 2.2
Brazing, soldering or welding operation	2	Reg 2.02, sec 2.3.4
Dipping operations - coating objects with oils, waxes, or greases	1	Reg 2.02, sec 2.3.9.1
Portable diesel or gasoline storage tanks, less than 250 gal.	2	Reg 2.02, sec 2.3.23
Paved, non-paved haul roads/truck traffic	various	no regulatory basis
Composing Process	1	no regulatory basis
4.8 MMBtu Boiler	1	Reg 2.02, sec 2.1.1
Non-halogenated cold solvent parts cleaners - secondary reservoir*	various	Reg 2.02, sec 2.3.22

- a. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with

negligible emissions have no applicable requirements.

- b. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - i. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.
 - ii. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
 - iii. No periodic monitoring shall be required for facilities designated as insignificant activities.